

EXHIBIT 3



Douglas R. Matthews

PARTNER

Columbus

52 East Gay Street
Columbus, Ohio 43215

t: 614.464.5460
drmatthews@vorys.com

Practice Areas

Antitrust and Trade Regulation

Appellate Practice

Class Actions

Employment Counseling

Employment Litigation

Litigation

Education

The Ohio State University Moritz
College of Law, J.D., *summa cum
laude*, 1987, with Honors, Order of
the Coif

Ohio State Law Journal, Issue
Planning Editor, 1985-1987

University of Virginia, B.A., 1984

Bar & Court Admissions

Ohio

U.S. Court of Appeals for the Sixth
Circuit

U.S. District Court for the
Southern District of Ohio

Doug is a partner in the Vorys Columbus office and a commercial litigator in the litigation group. His practice focuses on electronic discovery matters, and he is the head of the firm's electronic discovery practice group. Doug has represented numerous businesses with regard to the management and discovery of electronically stored information. He has represented both corporate and public entities in a variety of litigation matters, including multiple putative class actions and complex antitrust matters.

Career highlights include:

- Formulating strategy for and overseeing document and electronically stored information collection, review and productions by multiple corporate clients in antitrust litigation against Visa and Mastercard, employing a wide variety of advanced analytics including Technology Assisted Review (predictive coding) to assist in identifying responsive documents
- Formulating strategy for and overseeing document and electronically stored information production using Technology Assisted Review in an accelerated time frame for an FTC Second Request
- Regularly working with clients to develop cost-effective and defensible strategies for pre-litigation document management and post-litigation discovery obligations relating to documents and electronically stored information
- Regularly litigating electronic discovery issues in state and federal courts
- Successfully defending a large manufacturer in federal and state courts at the trial and appellate level in a variety of employment-related litigation, including two putative employment discrimination class actions and a sexual harassment jury trial
- Advising a large manufacturer on the development of validated selection systems for hiring and promotion and on the development of affirmative action plans

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Admitted to practice law only in the states listed above.

Industries

Colleges and Universities

Health Care

Manufacturing

Retail and Consumer Products

Clerkships

The Honorable Joseph P. Kinneary, United States District Court for the Southern District of Ohio, 1987-1989

The Honorable Alan Norris, United States Court of Appeals for the Sixth Circuit, 1989-1990

Doug regularly speaks nationally and locally on electronic discovery issues.

Doug received his J.D. *summa cum laude* from The Ohio State University Moritz College of Law, where he was the issue planning editor of the *Ohio State Law Journal* and a member of the Order of the Coif. He received his B.A. from the University of Virginia.

Doug clerked for The Honorable Joseph P. Kinneary, United States District Court for the Southern District of Ohio and for The Honorable Alan Norris, United States Court of Appeals for the Sixth Circuit.

Events

12.7.2019

Ethical and Professional Implications of an Ever-Evolving Legal Technology Landscape

5.16.2019

Trust and Ethics in the Age of Technology

4.25.2019

Trust and Ethics in the Age of Technology

8.13.2017

2017 International Legal Technology Association Conference

9.29.2016

Protecting Work Product in the Age of Electronic Discovery

9.1.2015

2015 International Legal Technology Association Conference

5.26.2015

Friends of EDiscovery at the Federal Court

4.29.2015

2015 Labor & Employment Update

9.19.2014

OSHRM/SOHA Fall Conference

9.21.2012

A New Day at the Courthouse

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6.19.2012

Corporate e-Discovery: Workflow, Teamwork, Technology

6.5.2012

E-Discovery for the Corporate Market Conference

6.1.2012

E-Discovery: Reducing Risk & Cost

4.26.2012

Privilege. Privacy. Preservation. Managing Risks with Electronic Communications Seminar

9.15.2011

The Changing Landscape of Electronic Discovery

10.27.2010

2010 E-Discovery CLE

9.14.2010

14th Annual Electronic Discovery and Records Retention Conference

9.14.2009

ILTA Statewide Meeting for Ohio Litigation Support Professionals